

## **Exhibit 7**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

AFT MICHIGAN,

Plaintiff,

v.

PROJECT VERITAS, et al,

Defendants.

Case No. 17-13292

Hon. Linda V. Parker

Hon. Elizabeth A. Stafford

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**AFFIDAVIT OF JAMES O'KEEFE**

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I, James O'Keefe, am over the age of eighteen years of age, am competent to testify, have personal knowledge of the matters to which I testify below, and hereby declare as follows:

1. I submit this declaration in support of Project Veritas's response to AFT Michigan's motion to compel discovery of the names of Project Veritas donors. ECF No. 134. I am familiar with AFT Michigan's claims, and I make these statements based on my personal knowledge. The facts set forth in this affidavit are true to my knowledge.
2. Project Veritas donors do not dictate the specific subjects of our investigative journalism.

3. Project Veritas donors do not dictate the methods we use in carrying out our investigations.

4. No Project Veritas donor had any input into the investigation of AFT Michigan in 2017.

5. Project Veritas focuses on uncovering corruption, fraud, waste, and abuse.

It is common that its stories are provocative, and the subjects of the stories become upset or seek retaliation. Because of this, myself, Project Veritas, and some of its reporters have been subject to harassment and threats.

Below are only some examples of such:

- a. After releasing an investigation in 2016 about the reality of the American political process involving Democracy Partners, *The Undercurrent*, an operation led by Lauren Windsor and sponsored by American Family Voices, created a website entitled, “Project Veritas Exposed.” PROJECTVERITAS.EXPOSED <https://www.projectveritas.exposed> (last visited May 11, 2020). The website endeavors to be a systematic tool of harassment against Project Veritas and its staff. It includes a “dossier” of suspected names of people connected to Project Veritas, including detailed individual pages listing otherwise private information such as their states of residence, family information, and employment histories.

Lauren Windsor created this website in retribution after Project Veritas Action Fund investigated Democracy Partners—an organization currently in litigation against Project Veritas Action Fund.

- b. After releasing our Democracy Partners investigation, Allison Maass, a former Project Veritas undercover journalist, was harassed and stalked on the streets of Washington, DC by Lauren Windsor, Ryan Clayton, and others on January 5, 2017. *Over-the-top anti-Trump protestors intimidate and harass young female journalist*, YOUTUBE, Jan. 31, 2017, <https://youtu.be/68i0bd2BIKk>. Windsor and Clayton chased Maass for twenty minutes while verbally abusing her. Clayton even followed her into a taxi cab, uninvited, to continue accosting her.
- c. On March 7, 2020, the *New York Times* ran a front-page article about Project Veritas and our supposed donors and/or supporters. Mark Mazzetti & Adam Goldman, *Erik Prince Recruits Ex-Spies to Help Infiltrate Liberal Groups*, N.Y. TIMES, Mar. 7, 2020, available at <https://www.nytimes.com/2020/03/07/us/politics/erik-prince-project-veritas.html>. It included details about my upcoming wedding. Following this, an anonymous writer harassed my fiancée.

The letter is cryptically written and alleges my fiancée will “marry all the karma of [my] evil soul” and she “will deserve it.”

**Attachment 1.**

- d. On January 29, 2017, Ryan Clayton snuck into and disrupted a private fundraising event hosted by the Friends of Abe. His purpose was to harass not only the Friends of Abe, but Project Veritas, and to question my character and the veracity of our operations. *See Over-the-top anti-Trump protestors intimidate and harass young female journalist, supra.*
- e. After Project Veritas investigated the *Washington Post*, on November 27, 2017 we discovered that an unknown individual vandalized our offices. This person left a graffiti message of “Fake News HQ” on the building. **Attachment 2.**
- f. Project Veritas has received several harassing or threatening messages left on our voicemail. One caller made sexually inappropriate suggestions that prisoners needed “fresh meat” and wanted to know when James O’Keefe would join him. *O’Keefe and Project Veritas Journalists Receive Threats in Hateful, Sexual Voicemails*, YOUTUBE, Aug. 29, 2016, [https://www.youtube.com/watch?v=u1flCAytpzU&feature=youtu.](https://www.youtube.com/watch?v=u1flCAytpzU&feature=youtu)



be. In another incident, another caller alleged we are “trying to destroy our country” and warned that they “will show you—you guys are going out of business.” Many others simply use profanity or attack the character of Project Veritas.

g. Project Veritas has received a variety of harassing e-mail messages espousing profanity or short statements like “rot in hell.”

h. On social media accounts like Facebook, a number of users routinely harass Project Veritas and leave disturbing messages like “Trump Trash,” “white trash terrorists,” “f\*\*\* a[ll] of you,” and “cowardly fascists,” and have threatened that Project Veritas will be “eradicated.” *See Attachment 3.*

6. Attempted public disclosure of the names of Project Veritas donor or suspected or purported donors has led to harassment. There are continued attempts to publicly embarrass our donors, and to use suspected donor information to obfuscate the results of our investigations.

a. After a controversial investigation of the *Washington Post*, *BuzzFeed News* systematically contacted more than two dozen alleged Veritas donors to undermine their purported support of Project Veritas. Kendall Taggart, *Here are some of Project Veritas's Funders*, BUZZFEED, Nov. 29, 2017,

<https://www.buzzfeednews.com/article/kendalltaggart/some-of-project-veritass-donors-express-reservations-about>.

- b. In 2017, the Chisholm Foundation withdrew support for Project Veritas due to calls by reporters about Veritas being de-registered for fundraising as a charity in Mississippi. Lachlan Markay, *James O'Keefe Donor Flees Over Failure to Disclose Criminal Record*, DAILY BEAST, Dec. 11, 2017,

<https://www.thedailybeast.com/james-okeefe-donor-flees-over-failure-to-disclose-criminal-record>.

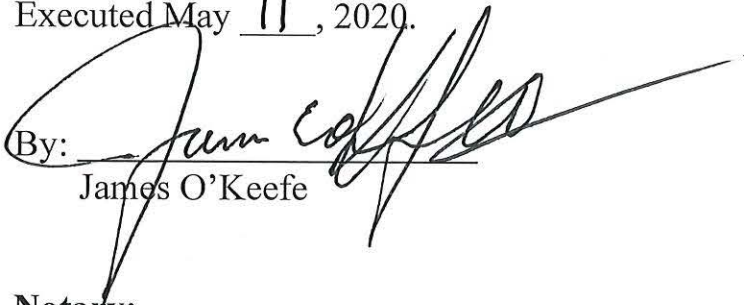
7. If donors to Project Veritas are to be disclosed to subjects such as AFT Michigan, many donors will be less willing to associate, aid, and support us in the future. Over years of fundraising and soliciting donor support, a substantial number have premised their support based on Project Veritas's ability to protect their anonymity. Without this promise, many donors would not make contributions to Project Veritas. Forced disclosure of donor names will seriously damage Project Veritas's ability to fundraise, work with likeminded allies, and engage in news operations.
8. I believe AFT Michigan, and possibly AFT National, will use the names of our donors to compile an enemies list or blacklist to harass Project

Veritas donors. See Exhibit 8 to Project Veritas's Response to AFT Michigan's Motion to Compel.

9. I believe AFT Michigan, if it acquires any donor names in discovery, will negligently make the names public, as already occurred once on the public docket of this case for approximately 18 hours. See ECF No. 133.

Pursuant to 28 U.S.C. § 1746, I, James O'Keefe, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed May 11, 2020.

By:   
James O'Keefe

Notary:

State of New York

County of Westchester

This record was acknowledged before me on May 11, 2020 (date)  
by Stacy H Goran (name of individual).

Signature of notarial officer 

Stamp      STACY H GORAN  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01GO6354051  
Qualified in Westchester County  
My Commission Expires 02-06-2021

Title of office Bookkeeper

My commission expires 02-06-2021



When you choose to marry a man who makes a living by lying to other people, you know he will lie to you, too, when it suits him.

But then, of course, you will deserve it.

You will lie to him, too, when you have to.

A family of liars.

When you choose to marry a man who makes a living by spying on other people—and enlisting others to spy on other people, you marry all the karma of his evil soul.

When you choose to marry a confessed criminal, you get a criminal spouse.

When the end justifies the means, as your boy claims, there are no ethics. No boundaries. No obligations. No loyalties.





Laurie Casey-bah

Assigned to Project Veritas ▼



Move to Done

JAN 11, 2020, 4:55 PM



You are an organized stalker group that aggressively spreads stupid staged propaganda.



Peggy Butherus

Assigned to Project Veritas ▼



Move to Done

FEB 26, 2020, 6:00 PM



Your a damn hypocrite, James. You are peddling false stories. Just another low-life right-wing Republican. You and your ilk have all but destroyed the GOP.



Alex Espy

Assigned to Project Veritas ▼




Move to Done





MAR 7, 2020, 11:20 AM



Hey there, Trump Trash!




**Marie Houslander**  
Assigned to Project Veritas ▼



✓ Move to Done




MAR 7, 2020, 6:54 PM



Project Veritas, a safe space for cowardly fascists everywhere.




**Johnnie Faglie**  
Assigned to Project Veritas ▼



✓ Move to Done

MAR 7, 2020, 2:52 PM



You people are white trash terrorists conspiracy pushing facists that'll be eradicated by the grace of God. Fuck a) of you





James Schlarmann

Assigned to Project Veritas ▼



Move to Done

WED 10:37 AM

Hey, if COVID isn't a big deal, why don't you have that convicted crook leader of yours, Jimmy Fuckface O'Keefe, go lick a thousand used test swabs. You know, to own the libs?



Fucking cunts.